

Exhibit C

Martin F. Petersen * August 17, 2015

<p>Sheet 5</p> <p>1 Q. Okay.</p> <p>2 A. We were based in Kuwait right at the</p> <p>3 beginning of 2003. And we continued that office -- I'm</p> <p>4 sure it moved after I left, I know they moved to</p> <p>5 different places, but we were based out of the Hilton</p> <p>6 resort while I was there. And so after about a year, I</p> <p>7 moved to the Salt Lake office or the Holladay office.</p> <p>8 Q. Okay.</p> <p>9 A. And so it was there for -- actually, I</p> <p>10 don't know how long it was there for. But then I left,</p> <p>11 and sometime after I left they moved to Bluffdale. And</p> <p>12 so then when I came back, after Africa, I officed in</p> <p>13 Bluffdale. And then after Bluffdale it moved to 90th</p> <p>14 South, and that's -- at that point it was shut down</p> <p>15 after that.</p> <p>16 Q. And I apologize if you have already</p> <p>17 explained this, but before Africa were you working for</p> <p>18 AMD and the Event Source simultaneously?</p> <p>19 A. Right after AMD was organized, I was</p> <p>20 effectively the CFO of that business. However, shortly</p> <p>21 after that it split and I was the Event Source CFO, and</p> <p>22 then AMD had a separate group running it. And that was</p> <p>23 a year-ish after.</p> <p>24 Q. And when you said they had a separate</p> <p>25 group running it --</p>	<p>17</p> <p>1 who were the managers?</p> <p>2 A. Paul Jeffries was CFO, who then became the</p> <p>3 CEO. I don't know when that happened. But I was no</p> <p>4 longer involved so I just know that from talking with</p> <p>5 Paul or Phil every once in a while.</p> <p>6 So Paul Jeffries was the CFO who then</p> <p>7 became the CEO. Dan Petsche was a contracts guy. I'm</p> <p>8 not sure the full scope of his stuff. Mike Bishop was</p> <p>9 the supply chain person. Neil Vos became the CFO. I</p> <p>10 think when Paul Jeffries became CEO, he hired Neil Vos</p> <p>11 as the CFO.</p> <p>12 Q. How do you spell "Vos"?</p> <p>13 A. V-O-S. But again, I wasn't there so I</p> <p>14 don't know exactly how things --</p> <p>15 Q. What time frame are we talking about right</p> <p>16 now?</p> <p>17 A. This would have been for the period after</p> <p>18 the contract was secured, the water bottling contract</p> <p>19 was secured, which I think was in the 2005, 2006 time</p> <p>20 frame. All of those people were involved, except for</p> <p>21 Neil Vos wouldn't have been right up front. He would</p> <p>22 have joined after Paul Jeffries became the CEO.</p> <p>23 Q. And how long did AMD perform water</p> <p>24 bottling services in Iraq?</p> <p>25 A. I think through January 3rd, which is when</p>
<p>18</p> <p>1 A. So Paul Morrell wasn't -- originally Paul</p> <p>2 Morrell was part of AMD. But in terms of managing AMD,</p> <p>3 it was mostly Phil. And as time went on, Phil really</p> <p>4 was the AMD person. And so Phil had his people</p> <p>5 operating AMD. And so it was kind of a separate</p> <p>6 business.</p> <p>7 Q. When did Phil become more involved?</p> <p>8 A. It was gradual. It would have been</p> <p>9 probably the 2005 time frame when he really kind of</p> <p>10 took over just AMD and had his people in it.</p> <p>11 Q. Okay. So after 2005, who were the people</p> <p>12 primarily managing AMD?</p> <p>13 A. Phil. The accounting person was Stewart</p> <p>14 Petersen. And then Phil had -- I don't recall any</p> <p>15 other names.</p> <p>16 Q. Tolly DiCosmo? Was he still --</p> <p>17 A. No. Tolly didn't come in until sometime</p> <p>18 after the water bottling business started. What I'm</p> <p>19 telling you is this is all prior to the water bottling</p> <p>20 business.</p> <p>21 Q. Okay.</p> <p>22 A. It's just when AMD was a construction</p> <p>23 business and the Event Source was a dining facility</p> <p>24 business.</p> <p>25 Q. So when it was a water bottling business,</p>	<p>19</p> <p>1 Paul sold the business, 2012.</p> <p>2 Q. But you're saying that you were not around</p> <p>3 during the time that AMD was doing the water bottling?</p> <p>4 A. I was not there until June, the end of</p> <p>5 June of 2011.</p> <p>6 Q. Okay. How long have you known Paul</p> <p>7 Morrell?</p> <p>8 A. I first met him I think in early 2003.</p> <p>9 Q. And how long have you known Phil Morrell?</p> <p>10 A. Same time.</p> <p>11 Q. Do you know Dan Hobson?</p> <p>12 A. I have met Dan Hobson. He came to</p> <p>13 Bluffdale once during the period I was there.</p> <p>14 Q. What was his position at AMD?</p> <p>15 A. He -- I'm not sure all the scope of it,</p> <p>16 but I believe he was logistics manager or maybe it was</p> <p>17 called supply chain manager. I'm not sure.</p> <p>18 Q. And where did he work when he was with</p> <p>19 AMD?</p> <p>20 A. I believe he was in Baghdad, or at Camp</p> <p>21 Victory, which is in Baghdad.</p> <p>22 Q. Do you know who hired him?</p> <p>23 A. I don't.</p> <p>24 Q. What was the purpose of him coming to</p> <p>25 Bluffdale?</p>

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<p>Sheet 10</p> <p>37</p> <p>1 MR. HANSEN: Objection to the extent it</p> <p>2 calls for a legal conclusion.</p> <p>3 Q. What was the effect on AMD of that sale?</p> <p>4 How was AMD impacted?</p> <p>5 A. AMD's business, the assets supporting</p> <p>6 AMD's business were sold to a gentleman who ran a</p> <p>7 business in Iraq.</p> <p>8 Q. After January 3, 2012, were Dan Hobson and</p> <p>9 Corey Larson still employed by AMD?</p> <p>10 MR. HANSEN: Objection to the extent that</p> <p>11 calls for a legal conclusion.</p> <p>12 A. Can I answer anyway?</p> <p>13 Q. Yes.</p> <p>14 MR. HANSEN: Yes.</p> <p>15 A. Corey was. I don't recall when Dan Hobson</p> <p>16 left the business.</p> <p>17 Q. Did Corey Larson receive pay checks from</p> <p>18 AMD?</p> <p>19 A. Yes.</p> <p>20 Q. How many employees in 2012 received pay</p> <p>21 checks from AMD?</p> <p>22 A. I don't know.</p> <p>23 Q. Were they informed of the sale -- I'm</p> <p>24 going to rephrase that. Was Corey Larson informed of</p> <p>25 the sale of the assets, as far as you're aware?</p>	<p>39</p> <p>1 realm of what he was to testify on behalf of the</p> <p>2 corporation on.</p> <p>3 But you can go ahead and answer.</p> <p>4 A. What was the question?</p> <p>5 Q. Do you have any understanding as to an</p> <p>6 agreement between Bright Pearl and AMD regarding AMD's</p> <p>7 employees?</p> <p>8 A. Yes. As I recall, the Iraqi gentleman who</p> <p>9 bought the business, he bought Bright Pearl because</p> <p>10 Bright Pearl was an Iraqi entity, and the assets</p> <p>11 supporting the business of the water bottling</p> <p>12 operations in Iraq were transferred to Bright Pearl,</p> <p>13 including employees. Does that answer your question?</p> <p>14 Q. Yes. I think that's a partial answer. I</p> <p>15 guess a follow-up question I would have is were the</p> <p>16 employees of AMD then employed by Bright Pearl in</p> <p>17 January 2012?</p> <p>18 MR. HANSEN: I'm going to object to the</p> <p>19 scope again. He wasn't designated to testify on behalf</p> <p>20 of the corporation on this topic.</p> <p>21 Q. Do you have any understanding or personal</p> <p>22 knowledge of that?</p> <p>23 A. I'll ask a question of you to clarify.</p> <p>24 Q. Okay.</p> <p>25 A. Technically or practically?</p>
<p>38</p> <p>1 A. I believe so. But I don't know for sure.</p> <p>2 Q. How many employees were in Kuwait or Iraq</p> <p>3 in 2012 under AMD, who were employed by AMD?</p> <p>4 A. At what point in 2012?</p> <p>5 Q. January.</p> <p>6 A. I don't know the number. I can give you a</p> <p>7 ballpark guess.</p> <p>8 Is that okay?</p> <p>9 Q. Sure.</p> <p>10 A. I'm asking my lawyer.</p> <p>11 MR. HANSEN: As long as it's characterized</p> <p>12 as a ballpark guess, that's fine.</p> <p>13 A. I'm guessing fifty, with a big question</p> <p>14 mark after it.</p> <p>15 Q. Were they slowly let go?</p> <p>16 A. Some were very quickly let go. But I</p> <p>17 think that the others were slowly let go.</p> <p>18 Q. Are you aware of any agreement between</p> <p>19 Bright Pearl and AMD regarding their employees, the</p> <p>20 employees of AMD?</p> <p>21 MR. HANSEN: I'm going to object to the</p> <p>22 scope and I believe it was asked and answered in Paul's</p> <p>23 deposition.</p> <p>24 MS. WILDE: Sure.</p> <p>25 MR. HANSEN: So this is outside of the</p>	<p>40</p> <p>1 Q. Let's say technically. But I want to</p> <p>2 reask the question so I know we are talking about the</p> <p>3 same thing.</p> <p>4 A. Okay. Go ahead and reask.</p> <p>5 Q. In January 2012, do you have any personal</p> <p>6 knowledge of the AMD employees then being employed by</p> <p>7 Bright Pearl?</p> <p>8 MR. HANSEN: Objection to the scope and to</p> <p>9 the extent it calls for a legal conclusion.</p> <p>10 A. Can I answer?</p> <p>11 Q. Yes.</p> <p>12 A. From a practical standpoint, yes, because</p> <p>13 the new management came in and wanted to terminate most</p> <p>14 of the people and we objected to that, saying these X</p> <p>15 number of people, and I don't remember names or</p> <p>16 numbers, but I just remember us fighting back saying,</p> <p>17 "We don't think it's a wise decision to terminate these</p> <p>18 people for these reasons." And so they backed off on</p> <p>19 some of the terminations they were planning to make,</p> <p>20 but not all of them. In other words, we convinced them</p> <p>21 on some, but we didn't convince them on all.</p> <p>22 Q. Okay. Were there any changes implemented</p> <p>23 that would alert AMD's vendors to the sale or transfer?</p> <p>24 MR. HANSEN: Objection to scope. It's</p> <p>25 been asked and answered.</p>